

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Karen Oldenburg
Debtor

Case No.09-58782-swr
Chapter 13
Honorable Steven W. Rhodes

Karen Oldenburg,
Plaintiff

Adv. Proc. No.09-05091-swr

v.

Bank of America,
Defendant

Jeffrey G. Bennett P43946
Attorney for Plaintiff
Marrs & Terry, PLLC
6553 Jackson Rd
Ann Arbor MI 48103
734-663-0555

**APPLICATION FOR ENTRY OF DEFAULT JUDGMENT AGAINST
BANK OF AMERICA**

Plaintiff, Karen Oldenburg, through counsel and pursuant to Fed. R. Bankr. P. 7055 and L.B.R. 7055-1 (E.D.M.), hereby submits this application (this "Application") for the entry of a judgment, substantially in the form attached hereto as *Exhibit A* (the "Judgment"), against Bank of America and respectfully states as follows:

1. On July 22, 2009 a Default Entry by Clerk, a copy of which is attached hereto as *Exhibit B*, was entered in the above captioned adversary proceeding.
2. Defendant failed to timely and properly plead or otherwise defend as provided by the Federal Rules of Bankruptcy Procedure, and that fact is made to appear

by the *Affidavit of Jeffrey G. Bennett*, attached hereto as *Exhibit C*, in support of this Application.

WHEREFORE, the Plaintiff respectfully requests the Court to enter the Judgment and grant Plaintiff such other and further relief as the Court deems just and proper under the circumstances.

Respectfully submitted,

Marrs & Terry PLLC

By: /s/ Jeffrey G. Bennett
Jeffrey G. Bennett (P43946)
Attorney for Plaintiff
Marrs & Terry PLLC
6553 Jackson Rd
Ann Arbor, MI 48103
734-663-0555
TTerry3272@aol.com

Dated: July 27, 2009